

NATIONAL PARKS WALES  
Britain's breathing spaces

The Clerk  
Environment and Sustainability Committee  
National Assembly for Wales  
Cardiff CF99 1NA

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## National Assembly for Wales Environment and Sustainability Committee Inquiry into Energy Planning and Policy in Wales

Thank you for this opportunity to contribute to the inquiry you are undertaking into energy planning and policy in Wales.

### Introduction

The Brecon Beacons National Park Authority (BBNPA); the Pembrokeshire Coast National Park Authority (PCNPA) and Snowdonia National Park Authority (SNPA) manage the three National Parks in Wales.

National Parks have two statutory purposes set out within Section 61 of the 1995 Environment Act:

- conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas;
- promoting opportunities for the public understanding and enjoyment of the special qualities of those areas by the public.

In carrying out these responsibilities the National Park Authorities (NPAs) shall also seek to foster the economic and social well-being of local communities within National Parks.

National Parks Wales is a partnership of the three NPAs. We aim to increase public and political understanding of the value of the National Parks of Wales to our national wellbeing. The co-ordinated dissemination of NPA expertise to inquiries and consultations is one approach currently utilised.

We present the following observations for your consideration. They are based upon the questions you have raised in your inquiry. These observations are based upon knowledge and experience acquired from our work within the National Parks.



What are the implications for Wales if responsibility for consenting major onshore and offshore energy infrastructure projects remains a matter that is reserved by the UK Government?

We believe that with regards to onshore wind farms uncertainty exists regarding the acceptability of large schemes greater than 50MW outside TAN8 Strategic Search Areas (SSAs). Developers already propose large onshore schemes outside SSAs (e.g. Mynydd Mynyllod) contrary to the spirit and letter of Welsh Government planning policy as set out in PPW and TAN8.

The South West approaches, and their offshore wind and tidal energy potential are drawing the attention of developers who may regard a single consenting body fairer and simpler.

It is perceived within communities that strong local objections to a proposal could be ignored or undervalued by the UK Government. Bringing decision making closer to Wales may be regarded as more equitable and in the medium to long term, more sustainable.

What will be the impact if consenting decisions on major infrastructure projects and associated development are not all taken in accordance with Welsh planning policy?

We wish to reinforce the view put by Snowdonia National Park Authority that there is scope for inconsistency. It is conceivable that two consenting bodies could arrive at different decisions on the merits of very similar wind farm proposals e.g. a scheme of 49MW, determined by a Local Planning Authority (LPA), and a one of 51MW, determined by the IPC (or successor institution) - where the difference is one turbine. The LPA would be bound by Welsh Government Policy whilst the IPC would have to have regard to the policy and afford it such weight as it deemed fit.

We believe this runs contrary to normal planning procedures in Wales, where LPA's, the Planning Inspectorate and the Courts take account of distinct Welsh Planning Policy. Any decision disregarding Welsh policy is legally dubious and likely to be challenged in the courts. It may also be contrary to European Legislation.

We would also add that the potential inconsistency referred to above may also encourage a particular development size/capacity (through what could be called "capacity-creep"). For example, if the IPC (or whatever follows it) was perceived as more likely to approve a large project than the relevant LPA was to approve a smaller one, then this might encourage projects to scale up (the "capacity-creep") in order to get over the nationally significant infrastructure threshold.

The role of the different consenting agencies, how they inter-relate and how the current system could be improved, both with and without further devolution (Infrastructure Planning Commission, Planning Inspectorate, Local Planning Authorities, National Parks, Welsh Government, Marine Management Organisation, Environment Agency).



We believe that the Welsh Government and Ministers should be able to determine major infrastructure in Wales, whilst paying due regard to the relevant National Policy Statements.

Although the Marine and Coastal Access Act 2009 has simplified the consenting regime offshore there is still a potential hiatus between onshore and offshore consenting. Consent gained in one of these realms could potentially prejudice the consenting process in the other. We hope to learn from the Committee's findings whether such tensions exist.

The relationship between the UK Government's Energy National Policy Statements and Welsh national and local planning policies (including Planning Policy Wales, Technical Advice Note 8 and Local Development Plans) and whether or not these policies can achieve the Welsh Government's aspirations, including whether or not a formal review of TAN 8 is now required.

We believe that UK National Policy Statements should recognise that the policies set out in Planning Policy Wales, Technical Advice Notes and adopted Local Development Plans have primacy in the planning decision-making process in Wales.

We believe that It may be an appropriate time to revisit TAN8 in the light of design and technological changes in the renewable energy sector since 2005. The scale of the new turbines proposed, some to 185m to blade tip, may contribute to significant visual, landscape and seascape impacts over a greater area. Increased public opposition to related infrastructure developments, such as the new National Grid high voltage power lines required for the transmission of the electricity produced in the SSAs, should also be addressed in revised advice.

It also appears that offshore wind farms can make a far greater contribution to meeting targets than was anticipated when TAN8 was originally drafted. We share the concern expressed by colleagues in Snowdonia National Park Authority that Wales is a relatively small country and the cumulative impact of wind turbines will have a greater visual impact. It would be unfortunate if we reached a situation in which designated protected landscapes such as National Parks faced "ring fencing" by large-scale turbines. Internationally important landscapes and seascapes may face damage, threatening the special qualities that attract large numbers of visitors to Wales.

The potential contribution and likelihood that different types of renewable and low carbon energy (*offshore wind, tidal, onshore wind, hydro-power, nuclear, bio-energy / waste, micro-generation, community energy projects*) will be capable of delivering the Welsh Government's aspirations for energy generation as set out in *A Low Carbon Revolution – Energy Policy Statement* and the *UK Renewable Energy Roadmap*.

Firstly, we wish to note that by including a moderate increase in energy efficiency across the National Park as well it is entirely possible to create 75% of a National Parks total energy requirements locally without the need for large infrastructure projects.

Renewable technologies present National Park communities and the agricultural sector with a more secure financial footing; they have the potential for increased economic



sustainability and resilience. The relatively low population density within National Parks is a key factor for National Park Authorities as they aim to hit the targets in terms of green energy generation (i.e Low Carbon Revolution but also, importantly, One Wales, One Planet). We have the available natural resources per capita to do this relatively easily, without the need for large-scale wind.

A significant proportion of Wales is covered by landscape and nature conservation designations – a reflection of its high landscape and ecological quality and value. Landscapes attract visitors to Wales and upland landscapes mitigate against climate change through the sequestration of carbon. The potential contribution that different types of renewable and low carbon energy can make within National Parks must be tempered by the need to understand, conserve and improve these qualities from which the nation derives additional economic, social and environmental benefits.

Given the necessary investment, focussing on the appropriate technology, hitting increased energy generation targets - without negatively impacting on landscape and ecology - would be relatively straightforward.

A place can be found for these technologies within National Parks, and the National Park Authorities have developed policies within their LDP (where adopted) or deposit LDP that favour small-scale renewable technologies that meet specific environmental/landscape or amenity considerations on a case by case basis. For instance policy 33 RENEWABLE ENERGY (Strategy Policy) of the Pembrokeshire Coast National Park LDP reads:

“Small scale renewable energy schemes will be considered favourably, subject to there being no over-riding environmental and amenity considerations. Medium scale schemes also offer some potential and will be permitted subject to the same considerations. Large scale renewable energy schemes will only be permitted where they do not compromise the special qualities of the National Park. Where there are other renewable energy schemes already in operation in the area, cumulative impacts will be an important consideration. Onshore connections to off shore renewable energy generators will also be permitted subject to there being no over-riding environmental and amenity considerations. Developers requiring an undeveloped coastal location for onshore connections to offshore renewable energy installations will need to clearly justify this need in relation to Policy 8i) with the least obtrusive approach to design being taken.”

Water from within Snowdonia National Park powers approximately 20 hydro powers stations with a combined total installed capacity in excess of 82MW. This is sufficient for 36, 500 households, more than double the number of households within the National Park. There may also be some limited potential for further river and micro-hydro schemes.

Within the Brecon Beacons the National Park Authority has given its support to the Green Valleys project, a not for profit Community Interest Company that enables community groups to source and install micro generation projects for community benefit. Established in May 2009 the project was Wales' only finalist in NESTA's Big Green Challenge competition. The project has widespread support amongst the communities within the



Brecon Beacons and associated projects are developing as a result of the strategic vision of Green Valleys. The project primarily focuses on hydro-electricity schemes; throughout early 2009 the community groups in The Green Valleys identified 92 possible hydro schemes. The first 23 sites that were surveyed came back as having the potential to generate 399kW (which represents 6% of the annual electricity demand for the homes in the Brecon Beacons). The Brecon Beacons National Park has the potential to generate approximately 50% of its electricity through hydro schemes and this is assuming that approximately 66% of technologically feasible sites would be inappropriate for ecological reasons. This presents a significant contribution to ensuring a sustainable future for residents.

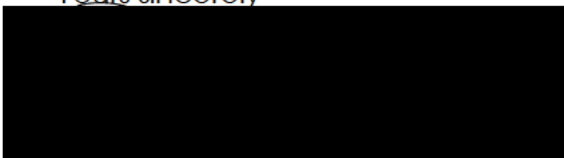
Where small-scale hydro-renewable developments are located within National Parks, National Park Authorities continue to insist that they are assessed on their merits with adequate safeguards in place to protect the ecological value of a particular watercourse or plot of land. These developments are best assessed from the bottom-up (as evidenced by the Green Valleys scheme or through the Sustainable Development Fund) within the National Park, by criteria based policies rather than imposed top-down, through specific allocations or areas of search.

The potential for harnessing energy from the sea or from facilities based offshore is huge once technological hurdles and hurdles related to economies of scale are overcome. National Park Authorities would not be expected to have direct planning involvement for offshore developments unless shore based facilities were also required. Trials of submerged tidal generators have been carried out off the coast of Pembrokeshire, where powerful currents are produced by coastal features interacting with the sea. The topography off the coast of Snowdonia is different, leading to weak tidal streams.

Other technologies - employed at a small-scale - could also generate significant amounts of energy within National Parks. Whether they are installed across a greater number of the housing stock (eg. solar-thermal systems, wood-based heating systems etc) or in the form of anaerobic digesters (10kW). The impact on the National Parks special qualities from the development of these technologies could be low.

If you require further or specific information concerning renewable projects and other energy developments within the National Parks, we are happy to do so. This response was a collaborative effort between officers within the three Welsh National Park Authorities; however should you wish to follow up any of the points raised in further detail please contact me in the first instance.

Yours sincerely



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Policy Officer

